

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

Re: Docket No. 1051

**CERTIFICATION OF COUNSEL REGARDING DEBTORS’
FIRST OMNIBUS OBJECTION TO CERTAIN CLAIMS (SUBSTANTIVE)
(Reduced and Reclassified Claims, No Liability Claims, Reclassified Claims)**

The undersigned counsel to JOANN Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On May 30, 2025, the *Debtors’ First Omnibus Objection to Certain Claims (Substantive) (Reduced and Reclassified Claims, No Liability Claims, Reclassified Claims)* [Docket No. 1051] (the “Objection”) was filed with the United States Bankruptcy Court for the District of Delaware (the “Court”). Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Objection (the “Proposed Order”).

2. Pursuant to the notice of the Objection, the deadline to file responses to the Objection was June 20, 2025 at 4:00 p.m. (prevailing Eastern Time) (the “Response Deadline”).

3. Prior to the Response Deadline, the Debtors received informal responses (collectively, the “Informal Responses”) to the Objection and Proposed Order from: (i) Rosenthal

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

& Rosenthal, Inc.; (ii) Hain Capital Investors Master Fund, Ltd., as current holder of Claim No. 1574 (originally filed by HTL Limited); (iii) Argo Partners, as current holder of Claim No. 278 (originally filed by Natraj Home Furnishings Pvt Ltd.) (the “Natraj Claim”); (iv) Horizon Group USA, Inc.; (v) CRG Financial LLC, as current holder of Claim No. 12007 (originally filed by Ningbo Tofoam Stationery Co Ltd.); (vi) Optimum Buying Ltd.; (vii) Far Eastern Handicraft Jsc-Vietnam; (viii) Constellation NewEnergy and Constellation NewEnergy – Gas; (ix) USA Debt Recovery Solutions, Inc., as current holder of Claim No. 11951 (originally filed by Shenzhen Rizze Cultural Creativity Co., Ltd) (the “Shenzhen Rizze Claim”); and (x) Cherry Design Partners LLC.

4. Additionally, prior to the Response Deadline, the Debtors received formal responses (collectively, the “Formal Responses” and together with the Informal Responses, the “Responses”) to the Objection and Proposed Order from: (i) OOCL USA Inc. [Docket No. 1074]; (ii) Grove Technologies LLC [Docket No. 1152]; (iii) Sincere Creates & Manufactures Limited [Docket No. 1193]; (iv) DMC Corporation [Docket No. 1208]; and (v) Glue Dots International [Docket No. 1209].

5. The Debtors have not received any other Responses to the Objection and Proposed Order.

6. To resolve the Responses,² the Debtors and the responding claimants, including the responding claimants’ counsel, if any, agreed to a revised Proposed Order, a copy of which is attached hereto as **Exhibit A** (the “Revised Proposed Order”).

7. The Debtors respectfully request that the Court enter the Revised Proposed Order at its earliest convenience.

² The unresolved Natraj Claim and Shenzhen Rizze Claim have been adjourned to the omnibus hearing currently scheduled for August 14, 2025 at 10:00 a.m. (prevailing Eastern Time).

Dated: July 9, 2025
Wilmington, Delaware

/s/ Michael E. Fitzpatrick

COLE SCHOTZ P.C.

Patrick J. Reilley (No. 4451)
Stacy L. Newman (No. 5044)
Michael E. Fitzpatrick (No. 6797)
Jack M. Dougherty (No. 6784)
500 Delaware Avenue, Suite 600
Wilmington, Delaware 19801
Telephone: (302) 652-3131
Facsimile: (302) 652-3117
Email: preilley@coleschotz.com
snewman@coleschotz.com
mfitzpatrick@coleschotz.com
jdougherty@coleschotz.com

*Co-Counsel to the Debtors
and Debtors in Possession*

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

Joshua A. Sussberg, P.C. (admitted *pro hac vice*)
Aparna Yenamandra, P.C. (admitted *pro hac vice*)
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900
Email: joshua.sussberg@kirkland.com
aparna.yenamandra@kirkland.com

- and -

Anup Sathy, P.C. (admitted *pro hac vice*)
Jeffrey Michalik (admitted *pro hac vice*)
Lindsey Blumenthal (admitted *pro hac vice*)
333 West Wolf Point Plaza
Chicago, Illinois 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
Email: anup.sathy@kirkland.com
jeff.michalik@kirkland.com
lindsey.blumenthal@kirkland.com

*Co-Counsel to the Debtors
and Debtors in Possession*